

REMARKS / DISCUSSION OF ISSUES

Claims 1-20 are pending in the application. Claims 7-20 are newly added.

Claims 1-6 are amended to restore the claims to their original scope. The applicant's prior amendments have had no effect on the determination of patentability of these claims, and the applicant herein retracts and recants all comments from the applicant's prior responses.

The Office action rejects claims 1-6 under 35 U.S.C. 103(a) over Martin (USP 4,618,919) and Archer (USP 5,177,675). The applicant respectfully traverses this rejection.

The Examiner's attention is requested to MPEP 2142, wherein it is stated:

"To establish a *prima facie* case of obviousness ... the prior art reference (or references when combined) ***must teach or suggest all the claim limitations***... If the examiner does not produce a *prima facie* case, the applicant is under no obligation to submit evidence of nonobviousness."

Claim 1, upon which claims 2-5 and 11-14 depend, claims a resonant LLC power converter comprising at least two transformers, wherein primary windings of the at least two transformers are coupled in series, and each one of the at least two transformers has a secondary winding for supplying a non-zero current to a common load during a substantially same period of time. Claim 6 includes similar limitations.

In this rejection, the Office action relies upon Martin for teaching two transformers with primary windings in series. The applicant respectfully notes, however, that the primary windings of Martin's transformers are not connected in series.

As is well known in the art, in a series connection of two circuit elements, the current from a source that flows through the first circuit element subsequently flows through the second component (Ampere's law). In Martin's circuit arrangement, the current that flows in each primary winding does not flow in the other primary winding.

When Martin's switch SW1 is in the "A1" position, current flows from the "+" terminal of Vin, through the primary coil NP1 of transformer T1, then to the "-" terminal of Vin.

When switch SW2 is in the "A2" position, current flows from the "+" terminal of Vin, through the primary coil NP2 of transformer T2, then to the "-" terminal of Vin.

When switch SW1 is in the "B1" position, current flows from the primary coil NP1 of transformer T1 to the capacitor C.

When switch SW2 is in the "B2" position, current flows from the primary coil NP2 of transformer T2 to the capacitor C.

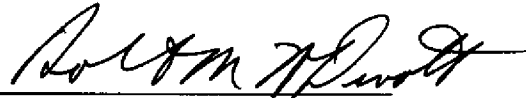
When switches SW1 and SW2 are in the "B1" and "B2" position, the primary coils NP1 and NP2 are connected in parallel with the capacitor C, and the current to and from C is split between the two coils.

There is no arrangement of switches SW1 and SW2 that place the primary coils NP1 and NP2 in a series arrangement.

Because Martin fails to teach or suggest two transformers with primary coils arranged in series, as specifically claimed in each of the applicant's independent claims, the applicant respectfully maintains that the Office action fails to establish a prima facie case, and thus the rejection of claims 1-6 under 35 U.S.C. 103(a) over Martin and Archer is unfounded, per MPEP 2142.

In view of the foregoing, the applicant respectfully requests that the Examiner withdraw the rejections of record, allow all the pending claims, and find the application to be in condition for allowance. If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,



Robert M. McDermott, Esq.  
Registration Number 41,508  
Phone: 804-493-0707  
Fax: 215-243-7525

**Please direct all correspondence to:**

Yan Glickberg, Esq.  
US PHILIPS CORPORATION  
P.O. Box 3001  
Briarcliff Manor, NY 10510-8001  
Phone: (914) 333-9618  
Fax: (914) 332-0615